In the matter of 1998 biennial Regulatory Review--Amendment
of Part 97 of the Commision's Amateur Service Rules, FCC WT
Docket 98-143

TO: Magalie Roman Salas, FCC Secretary
    Office of the Secretary
    Federal Communicataions Commission
    1919 M St, Washington DC 20554

FROM: Alex Funke, KC6IWR   28 August 1998

    I would like to comment upon the proposed rulemaking by the FCC with regard to the future of the
Amateur Radio Service license.

    I have held my Novice-with-Code license for about six years. I am proud that I am a member of
the chain of amatuer radio operators who have their roots in the Morse tradition. HOWEVER, I do
appreciate that times are changing and that the most important effort we have before us is to attract
more individuals, especially young people, to Ham Radio.

    Therefore, I applaud the notion of reducing the number of license categories to four:

1. A no-code Technician license which could be advertised to those experimenters who want to work in
the upper frequencies and whose interests lie less with old-time "rag chews" or contests, and lie
instead with realtime TV, telemetry, spread spectrum and other high-tech applications. Just get them
in. Just as 10 Mhz used to be considered the domain of the wierdos and the boy scientists, so today
the domain above 50Mhz is where the new discoveries will be found.

2. The General class license, which would be a code license, hopefully with expanded frequency
allocations.

3. The Advanced class, much as it is today

4. and the Extra class, also much as is today.

    I believe that the most benefit to Amateur Radio will come from the new Tech class and the
rejuevenated General class. It's quite likely that the Advanced and Extra classes will stay pretty
much as they are today in composition; and that's fine, especially if the FCC would make the General
Class much more attractive.

        First, as I said, a redistribution of frequencies to the Generals would be very helpful. It
could be the legitmate final step for many hams.

        Second, why not modify the code requirement (subject to the approval of the IARU) to be a
compromise 10wpm? Let the code test be a question of comprehension; that is, give a fairly long test
and require accurate information to be gotten from it. Instead of "perfect copy" of a section,
require tha, say, 20 information items be gotten from the test transmission; several QTH's, dates
and frequencies, weather, some electronic terms and so on. The purpose of the code is to exchange
information, not to study the intricacies of Robert Frost's poetry! Make the test consist of a
transmission and a 30-question exam requiring near-exact copy of the details. The FCC should set
exact rules for the way that this is to be done by the volunteer examiners, so that there can be no
tweaking of the test to discriminate against any examinee. There should be an informal complaint
process for anyone who feels that he has not gotten a fair shake; the right to see the correct
answeers, to confront the person responsible for the code test, the right to challenge a no-pass
grade.

        Those who are physically challenged and cannot write should be able to pass and oral test, in
which the "details" are sent and the examiner then gets a verbal copy. There should beno
discrimination against anyone who cannot take the exam in the standard way; but also there should not
be anyone passed who has not actually taken the test in some way.

    I don't think that the FCC should change the code requirements for the two highest classes. Let
these be challenge classes, like being admitted to the Boston Marathon, for those who enjoy meeting

and beating challenges.

I understand that there is a proposal on the table for changing the written exams to include more questions about the modern modes of communications. I think this would be a bad idea. More to the point would be to increase the questions on basic electronic theory. The exam should address two issues: one, is the applicant knowledgeable enough about the FCC and international rules for radio oepration so they will be competent, safe, and not be nuisances on the air. Second, does he/she know enough basic theory to be able to be more than an "appliance operator" and be able to work efficiently with the equipment? This means more questions on the rules, and more questions on theory--but not bringing in details such as "how does spread spetrum work "(say), which might be of interest to some but is certainly not essential to the normal work of the Amateur.

I urge that no provision be made requiring some kind of approval by upper-class operators (such as log-book approval, etc). This could be used as a lever to preserve the upper classes, and even General class, for the few. In addition, there are hams who simply like to be loners and don't want to seek out other hams to approve their standing.

My appreciation for the chance to address the FCC on this important topic.

Sincerely,

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